

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

NATIONAL STEEL CAR LIMITED,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 24-594-JLH
	:	
FREIGHTCAR AMERICA, INC.,	:	
	:	
Defendant.	:	

**STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME**

IT IS HEREBY STIPULATED by the parties to this action, through the undersigned counsel and subject to the approval of the Court, that the deadline for Plaintiff National Steel Car Limited to oppose Defendant FreightCar America's Motion to Dismiss (D.I. 11, 12) shall be extended through and including August 12, 2024, and that the deadline for FreightCar America to file a reply regarding that motion shall be extended through and including August 26, 2024. The Parties also stipulate that Plaintiff National Steel Car Limited may file an amended complaint through and including August 12, 2024 pursuant to Fed. R. Civ. P. 15(a)(2) and that FreightCar America may make any response thereto within 28 days after service of the amended pleading.

Dated: July \_\_\_\_, 2024.

SHAW KELLER LLP

PHILLIPS, McLAUGHLIN & HALL, P.A.

/s/ Andrew E. Russell

/s/ John C. Phillips, Jr.

John W. Shaw (#3362)  
Andrew E. Russell (#5382)  
1105 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 298-0700  
jshaw@shawkeller.com  
arussell@shawkeller.com  
*Attorneys for Plaintiff National Steel  
Car Limited*

John C. Phillips, Jr. (#110)  
David A. Bilson (#4986)  
1200 North Broom Street  
Wilmington, DE 19806  
(302) 655-4200  
jcp@pmhdelaw.com  
dab@pmhdelaw.com  
*Attorneys for Defendant FreightCar America,  
Inc..*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

---

The Honorable Jennifer L. Hall